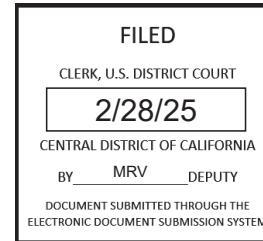


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Plaintiff in pro per



**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

EDWIN HAMID NAHAVANDI

Plaintiff(s),

vs.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY
(the State of California acting in its higher
education capacity); ERIKA DREW
BECK, in her official capacity as President
of California State University, Northridge;
ZEINA OTAKY RAMIREZ, in her
official capacity as Director of Student
Conduct and Ethical Development at
California State University, Northridge;
WILLIAM WATKINS, in his official
capacity as Vice President of Student
Affairs at California State University,
Northridge

Defendant(s).

Case No. 2:24-cv-03791-RGK(EX)

**SUPPLEMENTAL MEMORANDUM
IN SUPPORT OF LOCAL RULE 37
JOINT STIPULATION**

INTRODUCTION

1
2 1. This supplemental memorandum, pursuant to Local Rule 37.2.3, serves
3 as a true declaration under penalty of perjury signed by Plaintiff Edwin Hamid
4 Nahavandi, towards the events which took place in the United States Department of
5 Justice Federal building.

6 2. Video and audio surveillance cameras in the United States Department
7 of Justice Federal building can further confirm Plaintiffs statements.

8 3. Plaintiff requests that this Court obtain and review the video and audio
9 footage by subpoenaing the Department of Justice to verify Plaintiff's serious claims.

10 **STATEMENT OF FACTS**

11 4. The video and audio camera footage in the Department of Justice
12 Federal building can confirm that counsel Cristina Matsushima had:

13 5. Told Plaintiff that the Judge has agreed to dismiss Plaintiff's case before
14 the submission of their Motion for Discovery Sanctions and fine him, telling Plaintiff
15 that he is a stupid kid for believing that this Court will give him a trial and that
16 Plaintiff is too stupid to understand how the world works, or he would understand
17 why this happened to him;

18 6. Specified to Plaintiff that in the beginning before drafting the Motion for
19 Discovery Sanctions that Judge Charles has agreed with the Department of Justice to
20 dismiss Plaintiff's claims and fine the Plaintiff after the filing of their Motion for
21 Sanctions;

22 7. Told Plaintiff that the Department of Justice would delete and remove all
23 the video and audio surveillance tapes of their conversations, deny all of Plaintiff's
24 claims, and bring witnesses to support her alibi.

25 **RELIEF SOUGHT**

26 8. Give Plaintiff the video and audio surveillance tapes of the United States
27 Department of Justice Federal building, for proof of evidence in the anticipation of
28 future litigation.

1 9. Order the Department of Justice to preserve and maintain their video and
2 audio surveillance tapes, for proof of evidence in the anticipation of future litigation.

3
4 DATED: 2/28/25

5 Signature: Edwin Nahavandi

6 Plaintiff in Pro Per
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